

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**REPLY OF PUERTO RICO SALES TAX FINANCING CORPORATION
IN SUPPORT OF SIXTH OMNIBUS OBJECTION TO DEFICIENT CLAIMS**

The Puerto Rico Sales Tax Financing Corporation (“COFINA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as COFINA’s representative pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² files this reply (the “Reply”) in support of its Sixth Omnibus Objection, and in support of the Reply, respectfully represents as follows:

1. On December 4, 2018, COFINA filed the *Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Sixth Omnibus Objection”) [ECF No. 4410]. The Sixth Omnibus Objection sought to disallow in their entirety four hundred eighty-seven (487) deficient

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA” and together with the Commonwealth, COFINA, HTA, and ERS, the “Debtors”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

proofs of claim (the “Deficient Claims”) as listed on Exhibit A thereto. As set forth in the Sixth Omnibus Objection, each of the Deficient Claims fails to provide a basis for asserting a claim against COFINA (or any of the other Title III debtors), either by failing to provide any support for asserting a claim, or by stating in the proofs of claim and/or supporting documentation that the claimant had no claim or that the claim was against an entity other than COFINA or any of the other Title III debtors. Pursuant to the Court-approved notice, any party who disputed the Sixth Omnibus Objection and the relief requested therein was required to file a response by 4:00 p.m. (Atlantic Standard Time) on February 1, 2019.

2. Twenty-seven responses to the Sixth Omnibus Objection were interposed. The parties were able to resolve nine of those responses. Eighteen responses (the “Responses”) remain pending, and the Sixth Omnibus Objection reply chart, attached hereto as **Exhibit A**, addresses each of the Responses. The Responses fall into four categories: (a) those which assert liabilities associated with one or more bonds issued by COFINA that are duplicative of one or more master proofs of claim (each, a “Master Proof of Claim”, and collectively, the “Master Proofs of Claim”), which were filed in COFINA’s Title III case by the Bank of New York Mellon (“BNYM”); (b) those which assert liabilities associated with one or more bonds bearing contra CUSIP numbers, which are duplicative of CUSIP numbers listed on one or more Master Proofs of Claim; (c) those that provide information related to bonds not issued by COFINA, and fail to explain how or why these bonds provide a basis for asserting a claim against COFINA; and (d) one that provides no basis to assert a claim against COFINA.

I. Responses Supporting Duplicative Bond Claims

3. The Duplicative Responses³ provided documentation regarding bonds issued by COFINA. However, the CUSIP numbers corresponding to those bonds appear on one or more Master Proofs of Claim filed by BNYM. Accordingly, the Duplicative Responses assert liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim.

4. As the Court is well aware, the *Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation* (the “Plan”) [ECF No. 4652] was confirmed by the Court on February 4, 2019. *See Order and Judgment Confirming the Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation* [ECF No. 5048]. On February 5, 2019, the Court issued an *Amended Order and Judgment Confirming the Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation* [ECF No.

³ The “Duplicative Responses” are *Pro Se Filing of Claimants Peter Leavitt and Olga Stavros Leavitt JT TEN Disputing the Omnibus Objection* (the “Leavitt Response”) [ECF No. 4491], dated December 18, 2018, filed by Peter Leavitt (“Leavitt”) and Olga Stavros (“Stavros”); *Documentary Evidence – Proof of Claim* (the “Catala Monge Response”), [ECF No. 4479], dated December 14, 2018, filed by Jorge L. Catala Monge (“Catala Monge”); *Response of Hedwig M. Auletta (Claim #17116) to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Auletta Response”) [ECF No. 4980], dated January 29, 2019, filed by Hedwig M. Auletta (“Auletta”); *Amended Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (D.E. 4410) to Deficient Claims* (the “Marini Quesada Response”) [ECF No. 5124], dated February 1, 2019, and filed by Alexandra Marini Quesada and Victor Marini Quesada (“Marini Quesada”); *Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Casasnovas and García Garrido Response”) [ECF No. 5001], dated January 30, 2019, filed by María Emilia Casasnovas (“Casasnovas”) and Javier García Garrido (“García Garrido”); *Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Casasnovas Balado and Gandarilla Response”) [ECF No. 5005], dated January 30, 2019, filed by Raul E. Casasnovas Balado (“Casasnovas Balado”) and Lolita Gandarilla (“Gandarilla”); *Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Casasnovas Response”) [ECF No. 4999], dated January 30, 2019, filed by Maria Emilia Casasnovas (“Casasnovas”); *UBS Trust Company of Puerto Rico’s Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “UBS Response”) [ECF No. 5081], dated February 8, 2019, filed by UBS Trust Company of Puerto Rico (“UBS”); *Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Guzman de Vincenty Response”) [ECF 5035], dated February 1, 2019, filed by Maria Guzman de Vincenty (“Guzman de Vincenty”); and *Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Ramirez-Rivera and Rodriguez-Colón Response”) [ECF No. 4951], dated January 28, 2019, filed by Francisco M. Ramirez-Rivera (“Ramirez-Rivera”) and Lilia M. Rodriguez-Colón (“Rodriguez-Colón”).

5055] (the “Amended Order”). The Plan became effective on February 12, 2019, when the conditions set forth in Section 25.1 of the Plan were satisfied, *see* Amended Order at 20, when distributions were made to holders of Bond Claims pursuant to Article XIX of the Plan.⁴ Consequently, each of the claimants, to the extent they are holders of a Bond Claim(s) and listed on the records of the Depository Trust Company (“DTC”), have received distributions on account of their claims against COFINA.

5. Allowing any duplicate Bond Claim will result in claimants potentially receiving an unwarranted double recovery against COFINA, to the detriment of other stakeholders in COFINA’s Title III case. Claimants will not be prejudiced by the disallowance of their claims because the liabilities associated with their claims are subsumed within the Master Proofs of Claim.

II. Responses that Assert Liabilities Associated with Contra CUSIP Numbers

6. The Contra CUSIP Responses⁵ submitted documentation purporting to show bonds issued by COFINA, but wherein, the CUSIP numbers are, in actuality, “contra CUSIP” numbers.

7. By way of background, certain holders of COFINA securities electronically delivered their positions via the Automated Tender Offer Program at the DTC and made certain holder-specific distribution elections pursuant to the Plan. In connection therewith, DTC processed the Plan distributions for each tendered position based on each such holder’s distribution elections. In connection with the Plan distributions, holders of these securities have been electronically delivered into the applicable contra CUSIPs and have received new securities and/or

⁴ Section 1.44 of the Plan defines a “Bond Claim” as a “Claim on account of a ‘Senior’ or ‘First Subordinate’ Existing Security issued by COFINA” *See* Plan at 6.

⁵ The “Contra CUSIP Responses” are *Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Costas Response”) [ECF No. 5004], dated January 30, 2019, filed by Carlos A. Costas (“Costas”); and *Response to Puerto Rico Sales Tax Financing Corporation’s Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the “Casasnovas and Trinidad Response”) [ECF No. 5026], dated January 31, 2019, filed by Pedro Luis Casasnovas (“Casasnovas”) and Olga I. Trinidad Nieves (“Trinidad”).

cash accordingly. See **Exhibit B**, *Notice of Distribution to Holders*.

8. The CUSIP numbers identified in each of the Contra CUSIP Responses are contra CUSIPs, which correspond to bonds issued by COFINA bearing original CUSIP numbers. Those original CUSIP numbers, which reflect bond issuances in which the claimants held ownership interests before claimants made distribution elections, are listed in one or more Master Proofs of Claim. Therefore, the Contra CUSIP Responses assert liabilities associated with bonds issued by COFINA that are duplicative of liability asserted by a Master Proof of Claim. As explained above, as a result of being delivered into their contra CUSIPs, these claimants have received new securities and/or cash in accordance with their distribution elections.

9. Allowing those claimants' duplicate Bond Claims will result in their potentially receiving an unwarranted double recovery against COFINA, to the detriment of other stakeholders in COFINA's Title III case. These claimants will not be prejudiced by the disallowance of these claims because the liabilities associated with their claims are subsumed within the Master Proofs of Claim.

III. Responses that Assert Liabilities Associated with non-COFINA Bonds

10. The Non-COFINA Responses⁶ submitted documentation identifying bonds issued by other entities, including the Puerto Rico Public Financing Corporation ("**PFC**") and the

⁶ The "Non-COFINA Responses" are *Answer and Opposition to Objection to Claim in Sixth Omnibus Non-Substantive Objection (It. #111) to Claim by Edilberto Berrios Pérez and Ariadne Febles Gordián* (the "**Berrios Pérez and Febles Gordián Response**") [ECF No. 4922], dated January 25, 2019, filed by Edilberto Berrios Pérez ("**Berrios Pérez**") and Ariadne Febles Gordián ("**Febles Gordián**"); *Response to Puerto Rico Sales Tax Financing Corporation's Sixth Omnibus Objection to Deficient Claims* (the "**Rodriguez Quintana Response**") [ECF No. 5033], dated February 1, 2019, filed by Rafael Rodriguez Quintana ("**Rodriguez Quintana**"); *Answer to Puerto Rico Sales Tax Financing Corporation's Sixth Omnibus Objection (Non-Substantive) to Deficient Claims* (the "**Ifarraguerri Gómez Response**") [ECF 5039], dated February 1, 2019, filed by Carlos Ifarraguerri Gomez ("**Ifarraguerri Gómez**"); subsequently amended on February 13, 2019 [ECF No. 5120] (the "**Ifarraguerri Gómez Response**"); and *Answer to Sixth Omnibus Objection to Claims (Non-Substantive) Presented by Puerto Rico Sales Tax Financing Corporation* (the "**Criado Response**") [ECF No. 4849], dated January 22, 2019, filed by José R. Criado ("**Criado**") and Josefina del Valle ("**del Valle**").

Government Development Bank (“GDB”). GDB is a public corporation and instrumentality of the Commonwealth that issued bonds, engaged in intra-governmental lending, and served as fiscal agent and financial advisor of the Commonwealth of Puerto Rico. The PFC is a public corporation and instrumentality that is a subsidiary of GDB. COFINA, however, is a separate public corporation and instrumentality that issued its own bonds. It did not guarantee or otherwise insure payments on bonds issued by PFC or GDB.

11. Applicable provisions of the Bankruptcy Code and the Bankruptcy Rules plainly provide that claims asserted against an entity other than a debtor are disallowed. *See* Bankruptcy Code section 502(b)(1); Bankruptcy Rule 3007(d)(2); PROMESA Sections 301(a) and 310. Courts routinely disallow claims filed against a non-debtor:

When the face of a proof of claim does not assert a claim against the debtor and, in fact, admits that the basis of the claim is for services rendered, money loaned, or employment by a nondebtor person or entity, it is not properly executed and filed in the debtor’s case, and it cannot be *prima facie* evidence of the validity and the amount of a claim against the debtor under Federal Rule of Bankruptcy Procedure 3001(f).

Wilson v. Broadband Wireless Int’l Corp. (In re Broadband Wireless Int’l Corp.), 295 B.R. 140, 146 (10th Cir. B.A.P. 2003).

12. The Responses that fall into this category lack evidence that their claimants held any bonds issued by COFINA.

IV. Response Providing No Basis to Assert Claims Against COFINA

13. One remaining response, the *Objection to CONFINA [sic] Determination* (the “Sanchez Lebron Response”) [ECF No. 4877], dated January 24, 2019, filed by Miriam Sanchez Lebron (“Lebron”), fails to provide any basis to assert a claim against COFINA. Lebron’s proof

of claim was filed against COFINA on or about May 24, 2018, and was logged by Prime Clerk as Proof of Claim No. 29560 (the “Lebron Claim”).

14. In the Response, Lebron alleges that her grandfather, Eladio Lebron, was the illegitimate son of Antonio R. Roig Torellas and was thus owed an inheritance. Lebron alleges that the inheritance included various pharmaceutical companies and properties located within numerous municipalities, all of which are part of the Commonwealth of Puerto Rico. Exhibit 1 contains certain official records relating to the Lebron family, including a “Partition and Adjudication of Hereditary Assets” of Eladio Lebron’s estate, records related to Eladio Lebron’s military service, Eladio Lebron’s marriage certificate, and the will and demographic registration of Juana Lebron Perez, Lebron’s mother. Exhibit 2 contains records from the Commonwealth Courts and the United States District Court for the District of Puerto Rico, including requests made by Lebron to access certain files in the Commonwealth Courts’ archives, and a contract for legal services between Lebron and TuOficinaLegalPR (a Puerto Rican law firm). Exhibits 3, 4, 5, 6, and 7 to the Response contain hundreds of pages of what appear to be Google Maps search results for numerous locations in Puerto Rico. Similarly, the Claim purports to be an “inventory” and lists certain properties that allegedly do not belong to the Commonwealth. The Lebron Claim further alleges that the properties are used as a bond guarantee for the income obtained from private corporations built on the land. *See Claim at 5.*

15. On or about May 18, 2018, Lebron also filed proofs of claim against the Puerto Rico Electric Power Authority, the Puerto Rico Highways and Transportation Authority, and the Commonwealth of Puerto Rico, all in the amount of \$0.00, which were logged by Prime Clerk, LLC. *See Proofs of Claim Nos. 17433, 17219, 17230.*

16. On February 21, 2019, Lebron submitted supplemental information alleged to support her claim (the “Supplement”). The Supplement contained four binders each labeled as a “Folio.” Each Folio, like the Exhibits to the Response, contains hundreds more pages of what appear to be Google Maps search results for numerous locations in Puerto Rico.

17. Neither the Lebron Claim, the Response nor the Supplement provide any basis for asserting a claim against COFINA. As an initial matter, neither the court records nor the maps included in Exhibits 1-7 to the Response, nor the four Folios submitted as a Supplement, provide evidence to support Lebron’s alleged interest in either the municipalities or the pharmaceutical companies Lebron has listed as providing the basis for the Lebron Claim. As the Court is well aware, COFINA is a special purpose entity that issued bonds without any operations or employees. COFINA does not purport to own either the municipalities or the pharmaceutical companies Lebron has listed as providing the basis for the Lebron Claim. Likewise, COFINA has not guaranteed any income related to either the municipalities or the pharmaceutical companies at issue. Nowhere does Lebron draw a relationship between the “properties inventory,” and a basis on which any of the Title III debtors may be liable or otherwise responsible.

18. Accordingly, although Lebron has sought to remedy the deficiency in her “Deficient Claim,” none of the information or documentation provided serves that purpose.

19. For the reasons detailed above and in Exhibit A, COFINA respectfully requests that the Court grant the Sixth Omnibus Objection.

Dated: March 6, 2019

San Juan, Puerto Rico

Respectfully submitted,

/s/ Ricardo Burgos Vargas

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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record, and all CM/ECF participants in the case.

/s/ Ricardo Burgos Vargas

Ricardo Burgos Vargas

EXHIBIT A

Response	Basis for Response	Oversight Board's Reply
I. Duplicative Responses		
1. Leavitt Response, ECF No. 4491	<ul style="list-style-type: none"> Leavitt and Stavros filed their proof of claim against COFINA on or about April 9, 2018, and it was logged by Prime Clerk as Proof of Claim No. 6623. In the Leavitt Response, Leavitt and Stavros provide a bank statement reflecting a bond issued by COFINA. Leavitt Response Exhibit 1. 	<ul style="list-style-type: none"> The CUSIP corresponding to this bond appears on a Master Proof of Claim filed by BNYM and logged by Prime Clerk as Proof of Claim No. 31920. Accordingly, the Leavitt Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim. As the Leavitt Response shows that Leavitt and Stavros' claim is duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the Leavitt Response.
2. Catala Monge Response, ECF No. 4479	<ul style="list-style-type: none"> Catala Monge filed his proof of claim against COFINA on or about April 2, 2018, and it was logged by Prime Clerk as Proof of Claim No. 5933. In the Catala Monge Response, Catala Monge provides a portfolio holdings statement reflecting a bond issued by COFINA. Catala Monge Response Exhibit 1. 	<ul style="list-style-type: none"> The CUSIP corresponding to this bond appears on a Master Proof of Claim filed by BNYM and logged by Prime Clerk as Proof of Claim No. 31920. Accordingly, the Catala Monge Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim. As the Catala Monge Response shows that Catala Monge's claim is duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the Catala Monge Response.
3. Auletta Response, ECF No. 4980	<ul style="list-style-type: none"> Auletta filed her proof of claim against COFINA on or about May 21, 2018, and it was logged by Prime Clerk as Proof of Claim No. 17116. 	<ul style="list-style-type: none"> The CUSIP corresponding to this bond appears on a Master Proof of Claim filed by BNYM and logged by Prime Clerk as Proof of Claim No. 31920. Accordingly,

	<ul style="list-style-type: none"> In her Response, Ms. Auletta provides a trade confirmation statement reflecting a bond issued by COFINA. Auletta Response Exhibit A. 	<p>the Auletta Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim.</p> <ul style="list-style-type: none"> As the Auletta Response shows that Auletta's claim is duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the Auletta Response.
4. Marini Quesada Response, ECF No. 5124	<ul style="list-style-type: none"> The Marini Quesadas filed their proofs of claims against COFINA on or about October 31, 2017 and November 12, 2017, and they were logged by Prime Clerk as Proofs of Claims No. 256 and 294, respectively. In their Response, the Marini Quesadas provide a bank statement reflecting a bond issued by COFINA. Marini Quesada Response Exhibits 1, 2. 	<ul style="list-style-type: none"> The CUSIP corresponding to this bond appears on a Master Proof of Claim filed by BNYM and logged by Prime Clerk as Proof of Claim No. 31920. Accordingly, the Marini Quesada Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim. As the Marini Quesada Response shows that the Marini Quesadas' claim is duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the Marini Quesada Response.
5. Casanovas and García Garrido Response, ECF No. 5001	<ul style="list-style-type: none"> Casanovas and García Garrido filed their proof of claim against COFINA on or about March 23, 2018, and it was logged by Prime Clerk as Proof of Claim No. 4380. In their Response, Casanovas and García Garrido provide bank statements reflecting a bond issued by COFINA. 	<ul style="list-style-type: none"> The CUSIP corresponding to this bond appears on a Master Proof of Claim filed by BNYM and logged by Prime Clerk as Proof of Claim No. 31920. Accordingly, the Casanovas and García Garrido Response assert liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim.

	Casasnovas and García Garrido Response at 8.	<ul style="list-style-type: none"> As the Casasnovas and García Garrido Response shows that Casasnovas' and García Garrido's claim is duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the Casasnovas and García Garrido Response.
6. Casasnovas Balado and Gandarilla Response, ECF No. 5005	<ul style="list-style-type: none"> Casasnovas Balado and Gandarilla filed their proof of claim against COFINA on or about August 4, 2017, and it was logged by Prime Clerk as Proof of Claim No. 178. In their Response, Mr. Casasnovas and Ms. Gandarilla provide a portfolio summary reflecting bonds issued by COFINA. Casasnovas Balado and Gandarilla Response at 9, 10, 11, 21. 	<ul style="list-style-type: none"> The CUSIPs corresponding to these bonds appear on Master Proof of Claims filed by BNYM and logged by Prime Clerk as Proofs of Claims Nos. 31920 and 33139. Accordingly, the Casasnovas Balado and Gandarilla Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim. As the Casasnovas Balado and Gandarilla Response shows that Casasnovas Balado's and Gandarilla's claim is duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the Casasnovas Balado and Gandarilla Response.
7. Casasnovas Response, ECF No. 4999	<ul style="list-style-type: none"> Casasnovas filed her proof of claim against COFINA on or about March 23, 2018, and it was logged by Prime Clerk as Proof of Claim No. 4348. In her Response, Ms. Casasnovas provides a bank statement reflecting a bond issued by COFINA. Casasnovas Response at 10. 	<ul style="list-style-type: none"> The CUSIP corresponding to this bond appears on a Master Proof of Claim filed by BNYM and logged by Prime Clerk as Proof of Claim No. 31920. Accordingly, the Casasnovas Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim. As the Casasnovas Response shows that Casasnovas' claim is duplicative, the Court

		should grant the Sixth Omnibus Objection notwithstanding the Casasnovas Response.
8. UBS Response, ECF No. 5081	<ul style="list-style-type: none"> • UBS filed multiple proofs of claims against COFINA in June 2018, and they were logged by Prime Clerk.¹ • In its Response, UBS provides bank account statements reflecting bonds issued by COFINA. UBS Response at Exhibits A-E. 	<ul style="list-style-type: none"> • The CUSIPs corresponding to these bonds appear on Master Proofs of Claims filed by BNYM and logged by Prime Clerk as Proofs of Claims Nos. 31920 and 33139. Accordingly, the UBS Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim. • As the UBS Response shows that UBS' claims are duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the UBS Response.
9. Guzman de Vincenty Response, ECF No. 5035	<ul style="list-style-type: none"> • Guzman de Vincenty filed her proof of claim against COFINA on or around September 1, 2017, and it was logged by Prime Clerk as Proof of Claim No. 195. • In her Response, Guzman de Vincenty provides bank account statements reflecting bonds issued by COFINA. Guzman de Vincenty Response at 11, 12, 24, 34, 36, 44, 45. 	<ul style="list-style-type: none"> • The CUSIPs corresponding to these bonds appear on Master Proofs of Claims filed by BNYM and logged by Prime Clerk as Proofs of Claims Nos. 31920 and 33139. Accordingly, the Guzman de Vincenty Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim.

¹ Prime Clerk logged the proofs of claims as follows: 27301, 26296, 43356, 43396, 43875, 43416, 43544, 43919, 43889, 43958, 43615, 43864, 43857, 44297, 44225, 47082, 39594, 44282, 37839, 44366, 44340, 45147, 45142, 29953, 44804, 45205, 44295, 45222, 45231, 45252, 44435, 44772, 45284, 44421, 44786, 44799, 38523, 37563, 45319, 45560, 45558, 45561, 45575, 45584, 44703, 44552, 44481, 39574, 45886, 44820, 44784, 45897, 45728, 38136, 45733, 44189, 43814, 43861, 43956, 43536, 32486, 43529, 26360, 43935, 43840, 43852, 42717, 43523, 42448, 34256, 43525, 26304, 43905, 43926, 43892, 43306, 43313, 43340, 43902, 43506, 45874, 43886, 41544, 41511, 43946, 44173, 43328, 27303, and 45747.

		<ul style="list-style-type: none"> As the Guzman de Vincenty Response shows that Guzman de Vincenty's claim is duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the Guzman de Vincenty Response.
10. Ramirez-Rivera and Rodriguez-Colón Response, ECF No. 4951	<ul style="list-style-type: none"> Ramirez-Rivera and Rodriguez-Colón filed their proofs of claims against COFINA on or about May 14, 2018, and they were logged by Prime Clerk as Proofs of Claims No. 15006 and 15022 (the "Ramirez-Rivera and Rodriguez-Colón Claims"). In their Response, Ramirez-Rivera and Rodriguez-Colón provide documentation, in the form of a bank account statement, regarding a bond issued by COFINA. Ramirez-Rivera and Rodriguez-Colón Response at Exhibit 2. 	<ul style="list-style-type: none"> The CUSIPs corresponding to these bonds appears on a Master Proof of Claim filed by BNYM and logged by Prime Clerk as Proof of Claim No. 31920. Accordingly, the Ramirez-Rivera and Rodriguez-Colón Response asserts liabilities associated with bonds issued by COFINA that are duplicative of a Master Proof of Claim. As the Ramirez-Rivera and Rodriguez-Colón Response shows that Ramirez-Rivera and Rodriguez-Colón's claims are duplicative, the Court should grant the Sixth Omnibus Objection notwithstanding the Ramirez-Rivera and Rodriguez-Colón Response.
II. Contra CUSIP Responses		
11. Costas Response, ECF No. 5004	<ul style="list-style-type: none"> Costas filed a proof of claim against COFINA on August 4, 2017, and it was logged by Prime Clerk as Proof of Claim No. 176. The Costas Response provides documentation of a Banco Popular Securities account in which Costas purports to hold bonds issued by COFINA bearing CUSIP number 74529JNH4. 	<ul style="list-style-type: none"> The CUSIP number identified in the Costas Response is a contra CUSIP, which corresponds to bonds issued by COFINA bearing original CUSIP 74529JNH4. <i>See Exhibit B, Notice of Distribution to Holders.</i> This original CUSIP is listed in a Master Proof of Claim filed by the Bank of New York Mellon on behalf of holders of COFINA bonds in COFINA's Title III Case, which was logged by Prime Clerk as Proof of Claim No. 31920, as a Series

		<p>2009A Bond. Therefore, Costas' assertion of liability associated with a bond issued by COFINA bearing the contra CUSIP number reflected in Costas' account statement is duplicative of liability asserted by a master proof of claim.</p>
<p>12. Casasnovas and Trinidad Response, ECF No. 5026</p>	<ul style="list-style-type: none"> • Casasnovas and Trinidad filed proofs of claims against COFINA on August 4, 2017, and they were logged by Prime Clerk as Proofs of Claim Nos. 183 and 184. • The Casasnovas and Trinidad Response provides documentation of a Merrill Lynch account in which Claimants purport to hold bonds issued by COFINA bearing CUSIP numbers 74599BMX2, 74529BLQ8, 74599AYS2, 74599BFA0 and 74533BKK2. 	<ul style="list-style-type: none"> • The CUSIP numbers identified in Claimants' response are contra CUSIPs, which correspond to bonds issued by COFINA bearing original CUSIPs 74529JNL5 (Series 2009B Bond), 74529JMF9 (Series 2011B Bond), 74529JAC9 (Series 2007B Bond), 74529JGP4 (Series 2009B Bond) and J4529JLK9 (Series 2010C Bond), respectively. <i>See Exhibit B, Notice of Distribution to Holders.</i> Each of these original CUSIPs are listed in the master proofs of claim filed by BNYM on behalf of holders of COFINA bonds in COFINA's Title III Case, which were logged by Prime Clerk as Proofs of Claim Nos. 31920 and 33139. • Both the claims and the Casasnovas and Trinidad Response also asserted liabilities associated with bonds issued by COFINA bearing CUSIP number 74529JAC9. That CUSIP number is listed on the master proof of claim filed by BNYM and logged by Prime Clerk as Proof of Claim No. 33139.

		<ul style="list-style-type: none"> • Allowing Casasnovas' and Trinidad's duplicate bond claims will result in Casasnovas and Trinidad potentially receiving an unwarranted double recovery against COFINA, to the detriment of other stakeholders in COFINA's Title III Case.
III. Responses that Provide No Basis to Assert Liabilities Against COFINA		
13. Berrios Pérez and Febles Gordián Response, ECF No. 4922	<ul style="list-style-type: none"> • Berrios Pérez and Febles Gordián filed their proof of claim against COFINA on or about April 24, 2018, and it was logged by Prime Clerk as Proof of Claim No. 7999. • In the Berrios Pérez Response, Berrios Pérez and Febles Gordián provide documentation regarding a bond issued by the Government Development Bank ("<u>GDB</u>"). Berrios Pérez Response at 2, Exhibit A, Exhibit B. 	<ul style="list-style-type: none"> • Neither Berrios Pérez's and Febles Gordián's claim nor the Berrios Pérez and Febles Gordián Response allege that either Berrios Pérez or Febles Gordián held any bonds issued by COFINA. Instead, the claim and the Berrios Pérez and Febles Gordián Response assert only that Berrios Pérez and Febles Gordián held bonds issued by GDB. As such, there is still no evidence that their claim is valid as to COFINA or that either Berrios Pérez or Febles Gordián holds any valid claim against COFINA.
14. Rodriguez Quintana Response, ECF No. 5033	<ul style="list-style-type: none"> • Rodriguez Quintana filed his proof of claim against COFINA on or about June 29, 2018, and it was logged by Prime Clerk as Proof of Claim No. 114428. • The Rodriguez Quintana Response provides documentation regarding a bond issued by the Puerto Rico Public Finance Corporation ("<u>PFC</u>"). Rodriguez Quintana Response, Exhibit A. 	<ul style="list-style-type: none"> • Neither Rodriguez Quintana's claim nor the Rodriguez Quintana Response allege that Rodriguez Quintana held any bonds issued by COFINA. Instead, the claim and Rodriguez Quintana Response assert only that Rodriguez Quintana held bonds issued by the PFC. • As such, there is still no evidence that Rodriguez Quintana's claim is valid as to

		COFINA or that Rodriguez Quintana holds any valid claim against COFINA.
15. Ifarraguerri Gómez Response, ECF No. 5039	<ul style="list-style-type: none"> Ifarraguerri Gómez filed a proof of claim against COFINA on or about June 7, 2018, and it was logged by Prime Clerk as Proof of Claim No. 79037. The Ifarraguerri Gómez Response provides evidence of Ifarraguerri Gómez's ownership interest in two mutual funds (the Puerto Rico Investors Tax Free Fund and the Puerto Rico Fixed Income Fund, Inc.) <i>See</i> Ifarraguerri Gómez Response, Exhibit 2013 Statement, Exhibit 2014 Statement, Exhibit 2016 Statement, Exhibit 2017 Statement, Exhibit 2018 Statement. 	<ul style="list-style-type: none"> The Ifarraguerri Gómez Response does not identify any alleged investments by the mutual funds in bonds issued by COFINA. Accordingly, neither Ifarraguerri Gómez's claim nor the Ifarraguerri Gómez Response complies with the applicable rules, because neither provides a justification for purporting to assert a claim against COFINA.
16. Criado Response, ECF No. 4849	<ul style="list-style-type: none"> Criado and del Valle filed their proof of claim against COFINA on or about May 17, 2018, and it was logged by Prime Clerk as Proof of Claim No. 15865. The Criado Response provides documentation regarding a bond issued by the PFC, not COFINA. Criado Response, Exhibit A. 	<ul style="list-style-type: none"> Neither Criado and del Valle's claim nor the Criado Response allege that either Criado or del Valle held any bonds issued by COFINA. Instead, the claim and Criado Response assert only that Criado and del Valle held bonds issued by the PFC. As such, there is still no evidence that Criado and del Valle's claim is valid as to COFINA or that either Criado or del Valle hold any valid claim against COFINA.
IV. Miscellaneous Responses		
17. Sanchez Lebron Response, ECF No. 4877	<ul style="list-style-type: none"> Lebron filed a proof of claim filed against COFINA on May 24, 2018, and it was logged by Prime Clerk as Proof of Claim No. 29560. 	<ul style="list-style-type: none"> Neither the Lebron Claim, the Response nor the Supplement provide any basis for asserting a claim against COFINA. Thus, the claim should be disallowed in its entirety.

	<ul style="list-style-type: none">• The Lebron Response is premised on the allegation that Lebron's grandfather, Eladio Lebron, was the illegitimate son of Antonio R. Roig Torellas and was thus owed an inheritance.	
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EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,
Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO SALES TAX FINANCING
CORPORATION,

Debtor.

PROMESA

Title III

No. 17 BK 3284-LTS

NOTICE OF DISTRIBUTION TO HOLDERS OF THE FOLLOWING:

Plan Class	Class Description
1	Senior COFINA Bond Claims ²
2	Senior COFINA Bond Claims (Ambac)
3	Senior COFINA Bond Claims (National)
5	Junior COFINA Bond Claims
6	Junior COFINA Bond Claims (Assured)

The *Third Amended Title III Plan of Adjustment of Puerto Rico Sales Tax Financing Corporation*, dated January 9, 2019 (Docket Entry No. 439 in Case No. 17-3284) (as may be amended or modified, the “Plan”) was confirmed by the United States District Court for the District of Puerto Rico on February 4, 2019. The effective date of the Plan is February 12, 2019. As part of the mandatory exchange of the above referenced classes of

¹ The Debtors in these Title III Cases, along with each Debtor’s respective title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Unless otherwise defined in this Notice, capitalized terms used herein shall have the meanings ascribed to them in the Plan.

securities, holders will receive new securities and/or cash in accordance with the chart set forth on Exhibit A hereto.

This will be the first and final distribution. In addition, the Plan provides that no fractional bonds will be distributed, with fractional bonds rounded up or down to the nearest \$1,000. All Cash (other than Ambac and National Consideration Cash) shall be rounded up or down to the nearest cent (with half-cents rounded down). Ambac and National Consideration Cash shall be rounded down to the nearest cent. DTC is considered a single holder for rounding and distribution purposes and no additional securities or cash will be distributed to DTC or otherwise on account of rounding at the participant or beneficial holder level.

In addition to the mandatory exchanges referenced above, certain holders of the above referenced classes of securities electronically delivered their positions via the Automated Tender Offer Program at DTC and made certain holder specific distribution elections. In connection therewith, DTC is processing such voluntary distributions to each tendered position based on each holder's distribution elections. In connection with this voluntary distribution, holders of the securities referenced on Exhibit B hereto (which have been electronically delivered into the applicable contra cusips) will receive new securities and/or cash in accordance with the chart set forth on Exhibit B hereto. With respect to the voluntary exchange, no fractional bonds will be distributed, with fractional bonds rounded down to the nearest \$1,000. No fractional trust certificates will be allocated, with fractional certificates rounded up or down to the nearest whole dollar (with half-dollars rounded down). Rounding Amount Cash shall be rounded up or down to the nearest cent (with half-cents rounded down). Taxable Election Cash shall be rounded down to the nearest cent (with half-cents rounded down).

If you have any questions, please contact Prime Clerk by emailing puertoricoballots@primeclerk.com.

Exhibit A

Mandatory Exchange Distribution Allocation Information

Mandatory Exchange of Cash and New Securities		New COFINA Bonds - Series A																			
Plan Class	Target Cusip	103 Cash	COFINA Cash	Rounding Amount Cash	Ambac Consideration Cash	National Consideration Cash	Acceleration Price Cash	4.5% due 2034 CUSIP 745291 PU3	4.55% due 2040 CUSIP 745291 PV3	4.75% due 2053 CUSIP 745291 PW9	5.0% due 2058 CUSIP 745291 PX7	4.55% due 2040 (taxable) CUSIP 745291 PY5	4.75% due 2053 (taxable) CUSIP 745291 PZ2	5.0% due 2058 (taxable) CUSIP 745291 QAG	CAB due 2024 CUSIP 745291 QB4	CAB due 2027 CUSIP 745291 QC2	CAB due 2029 CUSIP 745291 QD0	CAB due 2031 CUSIP 745291 QE8	CAB due 2033 CUSIP 745291 QF5	CAB due 2046 CUSIP 745291 QG6	CAB due 2051 CUSIP 745291 QH1
		Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal
1	745291AA3		\$41.81247996	\$0.96331500				\$14.33556749	\$7.25641167	\$53.24321827	\$134.65905943	\$73.73843682	\$2.20649173	\$29.55741428	\$8.17592643	\$13.84811388	\$13.49360217	\$17.39323104	\$19.57569379	\$186.30698498	\$151.77532802
1	745291AB1		\$36.78686721	\$0.84853857				\$12.60462418	\$6.38103919	\$46.82191099	\$118.41385597	\$64.83798790	\$1.93917295	\$25.99651943	\$7.19317415	\$12.17369685	\$11.86707549	\$15.29791994	\$17.21231700	\$163.83525316	\$133.47145106
1	745291AC9	\$0.50416666	\$83.10532881	\$1.88779741				\$28.47418922	\$14.41933966	\$105.77256588	\$267.47688997	\$146.46817293	\$4.38486704	\$58.72252596	\$16.24179346	\$27.50869299	\$26.80982807	\$34.55196188	\$38.88632720	\$370.08760951	\$301.49089871
1	745291AD7	\$0.50416666	\$83.10532881	\$1.87573070				\$28.47007778	\$14.42310609	\$105.77348988	\$267.47974879	\$146.47007068	\$4.38700282	\$58.72394648	\$16.24343921	\$27.50523345	\$26.80743909	\$34.54992263	\$38.88838324	\$370.08585904	\$301.48963927
1	745291AE5	\$0.52916666	\$83.10740540	\$1.89777980				\$28.48000000	\$14.42000000	\$105.78000000	\$267.48000000	\$146.46000000	\$4.38000000	\$58.72000000	\$16.24000000	\$27.50000000	\$26.80000000	\$34.56000000	\$38.88000000	\$370.08000000	\$301.48000000
1	745291AQ8		\$10.50171210	\$0.23855650				\$3.60027295	\$1.82345878	\$13.37404659	\$33.82036641	\$18.51963824	\$0.55455260	\$7.42469918	\$2.05365857	\$3.74046800	\$4.36861335	\$4.91668754	\$46.79447866	\$38.12117233	
1	745291AR6	\$13.56250000	\$84.18999905	\$1.88896516				\$28.40669185	\$14.38607695	\$105.52450902	\$266.84939769	\$146.12450547	\$4.37490020	\$58.58392321	\$16.20274273	\$27.44336225	\$26.74614579	\$34.47052353	\$38.79574928	\$369.21957883	\$300.78414675
1	745291AS4	\$0.14280043	\$83.07531248	\$1.89510940				\$28.47794117	\$14.41911764	\$105.77941176	\$267.49264705	\$146.47794117	\$4.38235294	\$17.27941117	\$16.24264705	\$27.50735294	\$26.80882352	\$34.55147058	\$38.88970588	\$370.11029411	\$301.50735294
1	745291BB0		\$44.44476072	\$1.00563801				\$15.22593320	\$7.71119842	\$56.60690937	\$143.12377210	\$78.38898803	\$2.35756385	\$31.43418467	\$8.69351669	\$14.71021611	\$14.34184675	\$18.49214145	\$20.80058939	\$198.03536345	\$161.34577603
1	745291BC8		\$39.10295018	\$0.90860217				\$13.40072057	\$6.78542834	\$49.79983987	\$125.93074459	\$68.95516413	\$2.06164931	\$27.64211369	\$7.64611689	\$12.95036028	\$12.62090907	\$16.26301040	\$18.30464311	\$174.23939511	\$141.94355484
1	745291BD6		\$34.57433083	\$0.78850093				\$11.85826771	\$6.00000000	\$44.03149606	\$111.33858267	\$60.97637795	\$1.82677165	\$6.75595051	\$11.44881889	\$11.16535433	\$14.37795275	\$16.18897637	\$154.06299212	\$125.51181102	
1	745291BE4		\$32.51103471	\$0.74826614				\$11.14499066	\$5.64405724	\$41.40012445	\$104.69819539	\$57.33042937	\$1.71748599	\$22.98693217	\$6.35967641	\$10.76540136	\$10.49159925	\$13.52209085	\$15.22090852	\$144.86621032	\$118.01493466
1	745291BF1	\$0.50416666	\$83.10532881	\$1.88332851				\$28.47417139	\$14.42221558	\$105.77485816	\$267.47685876	\$146.46760226	\$4.38339802	\$58.72200656	\$16.24365482	\$27.50671842	\$26.80800238	\$34.55359808	\$38.88922066	\$370.08659301	\$301.49298297
1	745291BG9	\$0.50416666	\$83.10532881	\$1.89711007				\$28.46555037	\$14.41119956	\$105.76447982	\$267.47186384	\$146.4768734	\$4.39198462	\$58.71534491	\$16.25034312	\$27.50960323	\$26.81855613	\$34.55942904	\$38.89651386	\$370.07960472	\$301.48229481
1	745291BH7	\$0.50416666	\$83.10532881	\$1.90492719				\$28.46685644	\$14.42320726	\$105.76149515	\$267.48000542	\$146.45519859	\$4.39202976	\$58.72305815	\$16.23966813	\$27.51798613	\$26.81306764	\$34.53978582	\$38.87759251	\$370.09624508	\$301.50467669
1	745291BJ3	\$0.52916666	\$83.10740540	\$1.89777980				\$28.48000000	\$14.42000000	\$105.78000000	\$267.48000000	\$146.46000000	\$4.38000000	\$58.72000000	\$16.24000000	\$27.50000000	\$26.80000000	\$34.56000000	\$38.88000000	\$370.08000000	\$301.48000000
1	745291BK0	\$0.52916666	\$83.10740540	\$1.89777980				\$28.48000000	\$14.42000000	\$105.78000000	\$267.48000000	\$146.46000000	\$4.38000000	\$58.72000000	\$16.24000000	\$27.50000000	\$26.80000000	\$34.56000000	\$38.88000000	\$370.08000000	\$301.48000000
1	745291BL8	\$0.52916666	\$83.10740540	\$1.89777980				\$28.48000000	\$14.42000000	\$105.78000000	\$267.48000000	\$146.46000000	\$4.38000000	\$58.72000000	\$16.24000000	\$27.50000000	\$26.80000000	\$34.56000000	\$38.88000000	\$370.08000000	\$301.48000000
1	745291DY8		\$60.62053715	\$1.12142509				\$21.05623157	\$10.52631578	\$76.92130769	\$195.14170040	\$106.88259109	\$3.23886639	\$42.91497975	\$12.14574898	\$20.24291497	\$19.43319838	\$25.10121457	\$28.34008097	\$270.44534412	\$220.24291497
1	745291DZ5		\$57.08535668	\$1.05150403				\$19.40700808	\$9.70350404	\$72.77628032	\$183.82749326	\$100.80862533	\$3.23450134	\$40.43126684	\$11.32075471	\$18.86792452	\$18.32884097	\$23.71967654	\$26.95417789	\$254.44743935	\$207.00806255
1	745291EA9		\$53.75617357	\$1.24839241				\$18.41652323	\$9.2432013	\$68.5028175	\$173.14974182	\$94.83648881	\$2.75384881	\$27.53913941	\$17.38382099	\$22.37521514	\$25.12908777	\$23.95869190	\$23.95869190	\$195.18072289	\$195.18072289
1	745291EB7		\$50.62135894	\$1.18824969				\$17.34570391	\$8.79386849	\$64.46147640	\$163.00927793	\$89.68986688	\$2.66236385	\$36.78055667	\$9.88301734	\$16.78096066	\$16.33773275	\$22.71924162	\$22.54782855	\$183.74344493	
1	745291EC5		\$47.66928388	\$1.12743003				\$16.35131978	\$8.26909600	\$60.68675543	\$153.5153375	\$84.04578369	\$2.52277505	\$39.3461130	\$15.37024059	\$19.80845596	\$22.33123102	\$21.42770033	\$173.04368138		
1	745291ED3		\$44.88915018	\$0.94908536				\$15.39634146	\$7.77439024	\$57.16463414	\$144.51219512	\$79.11583565	\$2.43902439	\$31.70317037	\$8.84146341	\$14.93902439	\$14.48170731	\$18.75000000	\$21.03658536	\$200.00000000	\$162.95731707
1	745291EE1		\$39.80566698	\$2.343981																	

Plan Class	Target Cusip	103 Cash	COFINA Cash	Rounding Amount Cash	Ambac Consideration Cash	National Consideration Cash	Acceleration Price Cash	4.5% due 2034 CUSIP 74529J PU3	4.55% due 2040 CUSIP 74529J PV1	4.75% due 2053 CUSIP 74529J PW9	5.0% due 2058 CUSIP 74529J PX7	4.55% due 2040 (taxable) CUSIP 74529J PY5	4.75% due 2053 (taxable) CUSIP 74529J PZ2	5.0% due 2058 (taxable) CUSIP 74529J QA6	CAB due 2024 CUSIP 74529J QB4	CAB due 2027 CUSIP 74529J QC2	CAB due 2029 CUSIP 74529J QD0	CAB due 2031 CUSIP 74529J QE8	CAB due 2033 CUSIP 74529J QF5	CAB due 2046 CUSIP 74529J QG3	CAB due 2051 CUSIP 74529J QH1
		Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Cash per \$1,000 of Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal	Rate per \$1,000 Principal
5	74529JHM0	\$16.46875000	\$0.68182663	\$1.10178133				\$18.70890767	\$9.47376437	\$69.49965729	\$175.74696011	\$96.23537176	\$2.87868403	\$38.58553550	\$10.67194679	\$18.07427715	\$17.61734318	\$22.69946437	\$25.54768613	\$243.16502931	\$198.09610844
5	74529JHM8	\$15.50000000	\$0.68117681	\$1.10560972				\$18.72232480	\$9.48126364	\$69.55096726	\$175.87985385	\$96.30885101	\$2.88242986	\$38.61198879	\$10.67890876	\$18.08702289	\$17.62906674	\$22.71533910	\$25.56921816	\$243.34981451	\$198.24450143
5	74529JHP3	\$16.79166666	\$0.68204323	\$1.10874026				\$18.70045808	\$9.47271788	\$69.47900320	\$175.70141717	\$96.21332078	\$2.88025704	\$38.57364413	\$10.66890994	\$18.07045728	\$17.61145217	\$22.69493372	\$25.54366417	\$243.10344827	\$198.04349073
5	74529JHP9		\$0.27406718	\$0.46134132				\$7.73942093	\$3.92141266	\$28.76732898	\$72.73305758	\$39.82659879	\$1.19312758	\$15.96404708	\$4.41457206	\$7.47693286	\$7.20398663	\$9.39389118	\$10.57111040	\$100.63633471	\$81.98377236
5	74529JH57		\$0.25178387	\$0.41211273				\$7.11494317	\$3.60757590	\$26.42549353	\$66.83032267	\$36.58683234	\$1.09229381	\$14.67080869	\$4.05852889	\$6.87443631	\$6.69405752	\$8.62811905	\$9.71039182	\$92.45415372	\$75.31816815
5	74529JHT5		\$0.20060338	\$0.32916334				\$5.66769865	\$2.87100103	\$21.05263157	\$53.23623610	\$29.15170278	\$0.87305051	\$11.68833849	\$3.23219814	\$5.37574819	\$5.33539711	\$6.87719298	\$7.73938808	\$73.65737874	\$60.00619195
5	74529JHU2	\$17.43750000	\$0.68247645	\$1.10119674				\$18.69405669	\$9.46813450	\$69.44573442	\$175.61304304	\$96.16375738	\$2.87973074	\$38.55364638	\$10.66280583	\$18.06029812	\$17.60136950	\$22.68418608	\$25.53063621	\$242.98085065	\$197.94392693
5	74529JHW8	\$0.57500000	\$0.67116542	\$1.11593815				\$18.93667121	\$9.59226669	\$77.43467634	\$177.92787210	\$97.43462634	\$2.91238077	\$38.06308092	\$10.80679142	\$18.30462762	\$17.83168447	\$22.98921799	\$25.86441938	\$246.18911884	\$200.55768992
5	74529JHW6	\$0.57500000	\$0.67116542	\$1.11526303				\$18.93995552	\$9.58734865	\$70.36076105	\$177.93427230	\$97.43019520	\$2.91574005	\$39.06597479	\$10.81047689	\$18.29750432	\$17.84037558	\$22.9798517	\$25.87101556	\$246.19471213	\$200.55596738
5	74529JHY4			\$0.29562424				\$4.96322756	\$2.5131301	\$18.44048491	\$46.63584786	\$25.53897877	\$0.76486656	\$10.23744484	\$2.83252784	\$4.79512502	\$4.72152052	\$6.02227358	\$6.77873502	\$64.52616095	\$52.56566505
5	74529JIX4	\$9.36458333	\$0.67706129	\$1.05096167				\$18.81533101	\$9.40766550	\$70.03484320	\$176.65505226	\$96.86411149	\$2.78745644	\$38.67595818	\$10.80139372	\$18.11846689	\$17.77003484	\$22.99651567	\$25.78397212	\$244.59930313	\$199.30313588
5	74529JIY2	\$10.01041666	\$0.67749451	\$0.84467911				\$18.67572156	\$9.50764006	\$69.94906621	\$176.57045840	\$96.77419354	\$3.05602716	\$38.70967741	\$10.86587436	\$18.33616298	\$17.65704584	\$22.75042444	\$244.48217317	\$198.98132427	
5	74529JIU29	\$11.30208333	\$0.67836093	\$1.09494877				\$18.78119254	\$9.50879957	\$69.76622012	\$176.46440767	\$96.6377252	\$2.88941423	\$38.74441817	\$10.71710007	\$18.15077488	\$17.67796164	\$22.80010506	\$25.63251902	\$244.15550302	\$198.89676190
5	74529JKA2	\$11.62500000	\$0.67857754	\$1.12487803				\$18.74773796	\$9.48244661	\$69.77922547	\$176.4026109	\$96.63409337	\$2.89543571	\$38.72602243	\$10.71299312	\$18.16865725	\$17.66196163	\$22.80130293	\$25.62432138	\$244.08215900	\$198.84183858
5	74529JKB0	\$11.94791666	\$0.67879414	\$1.16130013				\$18.87287024	\$9.43643512	\$69.72477064	\$176.40891218	\$96.46133682	\$2.88335517	\$38.79423328	\$10.74705111	\$18.08650065	\$17.56225425	\$22.80471821	\$25.68807339	\$244.03669724	\$198.68938401
5	74529JIC8	\$12.27083333	\$0.67901075	\$1.33330295				\$18.73471721	\$9.45147679	\$69.70464135	\$176.37130801	\$96.54008438	\$2.86919831	\$38.64978902	\$10.63291139	\$18.05097172	\$17.72115898	\$22.78481012	\$25.65400843	\$243.88185654	\$198.81856540
5	74529JID6	\$12.59375000	\$0.67922736	\$1.02449216				\$18.79568395	\$9.53706922	\$69.68325791	\$176.26174730	\$96.55412460	\$2.92377305	\$38.70518621	\$10.72050121	\$18.09954571	\$17.68186564	\$22.76366127	\$25.61782109	\$243.9250953	\$198.67734075
5	74529JIE4	\$12.91666666	\$0.67944396	\$1.06243845				\$18.777331123	\$9.49026108	\$69.70576046	\$176.25362619	\$96.51885619	\$2.90093072	\$38.70700374	\$10.69208454	\$18.11023622	\$17.65437215	\$22.75176129	\$25.61127227	\$243.84583506	\$198.63240779
5	74529JIF1	\$12.91666666	\$0.67944396	\$1.15111348				\$18.69158878	\$9.61281708	\$69.69292389	\$176.23497997	\$96.39519359	\$2.93724966	\$38.71829105	\$10.68090787	\$18.15754339	\$17.62349799	\$22.69629293	\$25.63417890	\$243.79172229	\$198.6468651
5	74529JIG9	\$13.56250000	\$0.67987718	\$1.11817024				\$18.73797614	\$9.50355257	\$69.64217006	\$176.14467102	\$96.46017699	\$2.88572571	\$38.6681873	\$10.69642170	\$18.12235475	\$17.66063870	\$22.73951519	\$25.62524027	\$243.79011889	\$198.53789919
5	74529JIKH7	\$14.53125000	\$0.68052699	\$1.08455604				\$18.74246685	\$9.48171956	\$69.60626757	\$176.01446364	\$96.38408999	\$2.89272800	\$38.65006026	\$10.68702290	\$18.09963840	\$17.63760546	\$22.74005624	\$25.59260747	\$243.53135877	\$198.39292888
5	74529JIK3	\$14.20833333	\$0.68031039	\$1.10829070				\$18.74012673	\$9.49253625	\$69.62139903	\$176.05666303	\$96.40568700	\$2.88610021	\$38.65173325	\$10.68886561	\$18.10468769	\$17.64674559	\$25.59505848	\$243.59679795	\$198.4512682	
5	74529JIK0	\$13.88541666	\$0.68009378	\$1.10479735				\$18.74563284	\$9.49328964	\$69.63833939	\$176.10052285	\$96.43158325	\$2.88653832	\$38.66226537	\$10.69320290	\$18.10953425	\$17.65173601	\$25.60296846	\$243.65708502	\$198.49408476	
5	74529JIM6	\$14.20833333	\$0.68031039	\$1.10474575				\$18.74201664	\$9.49100058	\$69.6206963	\$176.05767369	\$96.40603832	\$2.88562028	\$38.65105477	\$10.69092316	\$18.10528353	\$17.64660344	\$22.74240371	\$25.59512289	\$243.59589703	\$198.44509671
5	74529JKN4		\$0.26421342	\$0.43516212				\$7.46604299	\$3.77799766	\$27.72330664	\$70.10884231	\$38.39165242	\$1.15138976	\$15.39983808	\$4.26374021	\$7.21417648	\$7.03427183	\$9.04920392	\$10.20059368	\$97.02257803	\$79.03211298
5	74529JIP9		\$0.24639081	\$0.39492131				\$6.97161347	\$3.52993087	\$25.85674363	\$65.39196940	\$35.79938226	\$1.05897926	\$14.35505221	\$3.97117223	\$6.73628474	\$6.55978820	\$8.44241800	\$9.50139726	\$90.48389469	\$73.71672304
5	74529JIKQ7		\$0.22891699	\$0.38297495				\$6.46692376	\$3.27631101	\$24.02188602	\$60.74689343	\$33.26411549	\$0.99541843	\$13.33597020	\$3.69161804	\$6.24938156	\$6.09116978	\$7.64488635	\$8.83351461	\$84.05682454	\$68.47292264
5	74529JIKR5		\$0.21389824	\$0.33856007				\$6.04000522	\$3.05922342	\$22.43430513	\$56.76559027	\$31.08903124	\$0.94129859	\$3.45143155	\$5.83082755	\$5.70009151	\$7.32121845	\$7.54621519	\$8.26251797	\$78.54621519	\$63.98221989
5	74529JKS3		\$0.19946976	\$0.33345497				\$5.63399448	\$2.85101895	\$20.93015343	\$52.93777430	\$28.98649338	\$0.87095566	\$11.62181471	\$3.21164903	\$5.44347293	\$5.30738611	\$6.83836287	\$7.69570986	\$73.24198235	\$59.66726771
5	74529JKT1		\$0.18629565	\$0.30928853				\$5.26049081	\$2.66042837	\$19.55068511	\$49.43896141	\$27.07463622	\$0.81079124	\$3.00185806	\$5.08674983	\$4.95644410	\$6.38498105	\$7.18612002	\$68.40568519	\$55.72741970	
5	74529JKU8		\$0.58592609	\$0.98991026				\$16.54761904	\$8.37797619	\$61.48809523	\$155.49107142	\$85.14880952	\$2.54462065	\$34.13690474	\$9.43452380	\$15.99702380	\$15.58035714	\$20.08928571	\$22.60416666	\$215.14880952	\$175.2678517
5	74529JKV6		\$0.58433634	\$0.970878234				\$16.50735387	\$8.30373513	\$61.32395299	\$155.07124467	\$84.91244169	\$2.54349860	\$34.0450562	\$9.41602340	\$15.94637286	\$15.54383013	\$20.03007825	\$22.54339680	\$214.59591435	\$174.79034437
5	74529JLD5	\$0.47916666	\$0.67111014	\$1.11453063				\$18.93792860	\$9.60084403	\$70.37102162	\$177.94970986	\$97.43274133	\$2.91893792	\$39.07156673	\$10.79655354	\$18.30490592	\$17.83013891	\$22.98224019	\$25.86601019	\$246.21065588	\$200.58027079
5	74529JIE3	\$0.47916666	\$0.67111014	\$1.10876196				\$18.94916540	\$9.59787556	\$70.37177541	\$177.94006069	\$97.43930197	\$2.92109256	\$39.07435508	\$10.81183611	\$18.30424886	\$17.83004552	\$22.98937784	\$25.87253414	\$246.20637329	\$200.56904400
5	74529JILF0	\$16.79166666	\$0.68204323	\$1.12063407				\$18.70142892	\$9.47605196	\$69.47438790	\$175.69984123	\$96.21459012	\$2.87457173	\$38.57274120	\$10.66265563	\$18.06634912	\$17.61510821	\$22.69574663	\$25.53689312	\$243.10186345	\$198.04462271
5	74529JILG8	\$12.91666666	\$0.67944396	\$1.09341326				\$18.7558623	\$9.49169476	\$69.68902210	\$176.24578493	\$96.51554889	\$2.89746471	\$38.69114524	\$10.69064568	\$18.13413263	\$17.65954789	\$22.75508929	\$25.62757587	\$243.83664293	\$198.65118021
5	74529JILH6	\$13.88541666	\$0.68009378	\$1.09297295				\$18.74487764	\$9.49537524	\$69.64055731	\$176.10350076	\$96.42898957	\$2.89193302	\$38.66057838	\$10.68961479	\$18.11263318	\$17.65601217	\$22.74909261	\$25.60590094	\$243.65999297	\$198.48963821
5	74529JILJ2	\$13.88541666	\$0.68009378	\$1.09360531				\$18.75196479	\$9.49386985	\$69.63219113	\$176.10814209	\$96.43193964	\$2.89217227	\$38.66708582	\$10.68846274	\$18.10751336	\$17.65168186	\$22.74441999	\$25.60515561	\$243.64979566	\$198.49104055
5	74529JILK9	\$15.50000000	\$0.68117681	\$1.10673767				\$18.72394545	\$9.48208860	\$69.54709248	\$175.87790574</										

Exhibit B

Voluntary Exchange Distribution Allocation Information

Voluntary Exchange Information

|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|--|